

RCRA COMPLIANCE EVALUATION INSPECTION

**POWEREX INC.
200 E. HILLIS STREET
YOUNGWOOD, PA 15697-1800**

Telephone Number: (724) 925-4453

Date of Inspection:
December 14, 2004

RCRA Identification Number: PAD005000518

EPA Representatives:

Jeffrey A. Dodd, Environmental Scientist
Office of Enforcement, Compliance and
Environmental Justice
(304) 234-0254

State Representative:

Gerald Tripoli, Waste Management Spec.
PA Dept. of Env. Prot.- Greensburg Office
(724) 925-5404

Facility Representative:

Andrew Varga, Human Resources Director
Powerex, Inc.
(724) 925-4453

Background

On December 14, 2004, the United States Environmental Protection Agency, Region III ("EPA"), Office of Enforcement, Compliance and Environmental Justice conducted an unannounced Compliance Evaluation Inspection ("CEI") under the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. of Powerex, Inc. USEPA Inspector Jeffrey Dodd was accompanied by Pennsylvania Department of Environmental Protection ("PADEP") Solid Waste Specialist, Gerald Tripoli. The facility was represented by Andrew Varga, Human Resources Director.

The inspection included both an evaluation of Powerex's processes and compliance with federal environmental regulations. PADEP Inspector, Gerald Tripoli evaluated Powerex's processes and compliance with state environmental regulations. All information included in this report are the results of statements by the facility representative, documents shown or provided to the inspectors by the facility representative during the inspection, facility conditions observed at the time of the inspection and a review of EPA and state records.

General Facility Information

The Powerex, Inc. facility is located in Youngwood, PA at 200 Hillis Street (Attachment 1). Powerex manufactures semi-conductors for use in high temperature industrial applications.

Permit Status

Powerex, Inc. is a large quantity generator (LQG) of hazardous waste with RCRA ID. No. PAD005000518. See Attachment 2 for additional information.

Inspection Observations

EPA Inspector Dodd and PADEP Inspector Tripoli began the inspection with presentation of official credentials and a full explanation of the scope and purpose of the RCRA CEI to Mr. Andrew Varga, Human Resource Director for Powerex, Inc. Mr. Varga indicated he was responsible for overall management of waste at the facility. Mr. Varga also indicated that Mr. Don Elder, Process Engineer is responsible for day-to-day waste management and handling at the facility. EPA Inspector Dodd and PADEP Inspector Tripoli then interviewed Mr. Varga and Mr. Elder concerning generation and management of wastes produced at the facility which was then followed by a visual inspection of the facility's processes, waste generation points and management operations.

According to facility representatives, the facility produces semi-conductors for use in high power/temperature applications primarily for use in the power generation, welding, locomotive and military industries. In general, the production process may include application of a pattern to pre-fabricated silicon wafers, introduction of various metals to the silicon wafers via a diffusion process, addition of a substrate to the silicon wafer to provide heat dissipation

qualities and added strength to the wafer and assembly of the manufactured wafer into a final semi-conductor package based on customer specifications. According to facility representatives raw materials used in the production process(es) include silicon, copper, tungsten, molybdenum, ceramics, aluminum oxide, various acids/caustics and solvents.

Facility representatives indicated that typical hazardous waste streams generated at the facility include wastewater treatment sludges from electroplating processes (F006), waste organic solvents, (D040, F001), waste flammable solvents (D001, D002, F003, F005), waste photo-resist stripper (D002, D023, D027, D039), solvent contaminated rags (F003), waste cyanide solution from gold plating operations (D003, F007), waste flammable liquids/solids from leksol (D035, D001, D039), acid contaminated rags (D002, F003), waste n-propylbromide/tetrachloroethylene (D001/D039) and various waste laboratory chemicals sent off-site as lab packs. Small amounts of mercury containing waste such as thermometers, light bulbs and ballasts are also generated on occasion. Recent waste minimization activities at the facility include substitution of n-propylbromide for chlorinated solvents reducing the amounts of this waste stream. Facility representatives did not anticipate any major changes to production processes in the future which would affect current hazardous waste generation at the facility.

The largest hazardous waste stream generated at the facility is the waste water treatment plant sludge from electroplating processes (F006). Industrial process waste waters from the electroplating process are conveyed to the facility's waste water treatment plant (WWTP) where it is treated. The resulting sludge from the industrial WWTP process of the industrial waste water is handled as hazardous waste (F006). The treated industrial waste water is then mixed with non industrial process sanitary waste water generated at the facility, where it is again treated at the WWTP prior to discharge under a NPDES permit. Sludge generated from this treatment process is disposed of as non-hazardous waste.

The second largest hazardous waste stream generated at the facility is waste flammable solvents (D001, D002, F003, F005) which the facility accumulates and stores in an aboveground storage tank located on the exterior of the production facility. The solvents are used as degreasers and cleaners in a variety of processes at the facility. In general, the solvents are in dedicated vats or stations which are either hard piped directly to the above ground storage tank or are emptied into a "flammables" can which is then carried to a central "dump station" which is hard piped to the aboveground storage tank. According to facility representatives, the waste solvents are transported via gravity within the piping to the above ground storage tank. According to PADEP Inspector Tripoli, the facility formerly utilized two (2) above ground storage tanks to accumulate hazardous waste flammable liquid waste streams, but removed one of the ASTs from service. According to PADEP, the facility failed to provide notification of a tank closure for this AST. See Attachment 3.

At the conclusion of the interview, the facility representatives escorted EPA Inspector Dodd and PADEP Inspector Tripoli on a tour of the facility. Pertinent observations concerning the storage and management of hazardous waste are provided below.

Mixed Flammable Solvent Station

- Inspectors observed a collection station used by facility personnel to place the flammable solvent waste stream (D001, D002, F003, F005) for transmission of this waste stream to a designated storage tank.. The collection station is an enclosed cabinet with a bottom draining basin which is piped to a storage tank located outside the manufacturing building. The cabinet is labeled for disposal of flammable solvent waste. See photos 1 & 2.

Cyanide/Gold Plating Operation

- Facility representatives showed inspectors the cyanide/gold plating operation which utilize filters to remove plating sludge/particulate from the baths. The filters are removed from the baths when spent, placed in 55-gallon drums for storage and subsequent disposal. The facility determined the waste filters to be D003 characteristic waste. However, the filters actually accumulate plating bath residues from plating baths from electroplating operations where cyanides are used in the process.

Waste Acetone Collection Container

- Inspectors observed one (1) satellite accumulation container stored within a closed flammable cabinet used to accumulate waste acetone during production processes. Once full, the waste acetone is transferred to the flammable solvent waste stream storage tank. The container was marked as containing waste acetone.

Solvent Contaminated Rags

- According to facility representatives, solvent contaminated rags are recycled through a vendor (Coyne Textile Services). The contaminated rags are stored in lidded containers until they are picked up by the vendor. The vendor cleans the rags and returns them to the facility for re-use.

Hazardous Waste Storage Area

- Inspectors observed the hazardous waste container storage area which was located in a fenced area immediately adjacent to the production building. Nine (9) containers (seven - 55-gallon drums and two 5-gallon pails) of hazardous waste were observed staged in the area. See photos 4 through 8. All containers were dated. All dates were < 90 days at the time of the inspection. Six (6) of the nine (9) containers were labeled as containing hazardous waste. Three (3) drums were labeled to contain "nitric acid waste solids" and were dated December 10, 2004.

Facility representatives indicated that the nitric acid waste solids would be disposed of as hazardous waste. However, the containers were not labeled as containing hazardous waste.

Waste Solvent Storage Tank

- Inspectors observed one (1) above ground storage tank located within a fenced area immediately adjacent to the production building. See photos 9 & 10. According to facility representatives this storage tank accumulates and stores waste flammable solvents (D001, D002, F003, F005) from the facility's production processes. The tank was labeled as containing flammable materials, but was not labeled as containing hazardous waste, nor was any accumulation date present on the tank. Facility representatives indicated that the tank is inspected for leakage and volume on a bi-weekly basis by the contracted waste disposal firm. Facility representatives indicated that the hazardous waste in the tank is removed every few weeks so that waste storage time never exceeds 90 days which can be verified by the hazardous waste manifests.

Waste Water Treatment Plant

- Inspectors toured the facility's waste water treatment plant and observed the wastewater treatment sludge from electroplating processes (F006) storage tank. The tank was labeled to contain F006 hazardous waste. No accumulation date was noted on the tank. Facility representatives indicated that the tank is inspected for leakage and volume on a daily basis by the WWTP operator and weekly by the contracted waste disposal firm. Facility representatives indicated that the hazardous waste in the tank is removed at least every 90 days or sooner which can be verified by the hazardous waste manifests.

Upon completion of the facility tour, EPA Inspector Dodd and PADEP Inspector Tripoli acquired additional information from facility representatives via interviews and reviewed requested documentation including hazardous waste manifests, training documentation, contingency plan information and other documents related to hazardous waste generation and management at the facility. Copies of several documents were requested by the inspectors which were provided by the facility at the conclusion of the inspection. Upon completing review of requested documentation at the facility, a closing conference was held between the inspectors and facility representatives. Areas of concern noted during the inspection were briefly discussed with the facility representatives.

Inspection logs

The facility indicated the hazardous waste storage area is inspected bi-weekly by waste disposal contractors hired by the facility. The facility indicated that no documentation of the inspections are kept. Facility representatives indicated that the flammable solvent waste tank is

inspected daily by the security guard on-duty and any abnormalities would be recorded by the security.

Manifests

Selected hazardous waste manifests and land disposal restriction (LDR) forms for calendar years 2004 and 2001 were reviewed as part of the inspection. Manifests and LDR forms reviewed were signed by the generator, transporter(s) and TSD facilities. Copies of selected hazardous waste manifests and LDR forms obtained during the inspection are included as Attachment No. 4 to this report.

Training

The facility provided documentation of job title, job description and training records for the individual(s) responsible for hazardous waste management at the facility. The job descriptions provided by the facility representative did not specify personnel's responsibilities for hazardous waste management and the training required by each person responsible for hazardous waste management at the facility. The facility provided documentation of training for key personnel. However, training had not been reviewed or updated since 2000 for one individual and 1997 for another. See Attachment 5. The facility representative indicated refresher training is scheduled for January 19, 2005.

Preparedness and Prevention Program

The facility maintains a preparedness and prevention program which includes internal/external communications and alarm systems, fire control, spill control and decontamination equipment. The facility has an internal fire water system which utilizes public water supply as a source of water. Generally good housekeeping and organization was observed throughout the facility allowing unobstructed access to hazardous waste storage areas in case of an emergency. The facility relies on local emergency response organizations, e.g., hazardous materials response team and firefighting teams in case of emergency. The facility has procedures in place for required notifications to outside authorities and organizations in the event of an emergency. Facility representatives stated that local authorities have been familiarized with the nature of hazards present at the facility.

Contingency Plan

The facility has documented procedures in place which describe actions to be taken in case of emergency including a description of actions to be taken in case of emergency, procedures for coordination with local authorities, listing of facility emergency coordinators including contact information, listing of emergency equipment present at the facility and employee evacuation plans.

Biennial Report

The 2004 Biennial Report submitted to PADEP by Powerex, Inc. on February 24, 2004 was reviewed during the inspection. A copy of the 2004 Biennial Report is included as Attachment No. 6 to this report.

Air Emission Standards

During an inspection on January 15, 2003, PADEP Inspector Tripoli conducted an evaluation of the facility's compliance with RCRA's Air Emission Standards specified in Subparts AA, BB and CC of 40 CFR 265. See Attachment 7. Powerex has no process vents, or equipment which manage hazardous waste greater than 10 ppm organics which are regulated under RCRA Subparts AA or Subpart BB. At the time of PADEP's January 2003 inspection, the facility had two (2) aboveground storage tanks, of which the facility was using one (1) of the tanks for storage of hazardous waste mixed organic solvents. According to Inspector Tripoli, facility representatives presumed the volatile organic content of the material being stored in the tank contained greater than 500 ppmw at the point of generation, which would make the facility subject to RCRA air emission standards under Subpart CC. PADEP informed the facility that a determination of the volatile organic concentration in the waste stream needed to be determined, documented and reviewed annually. In addition, Inspector Tripoli noted that the two storage tanks did not have a closure device, e.g., pressure relief valve, installed on the tanks' vent pipes. Inspector Tripoli also informed that the facility was responsible for inspecting (and documenting the inspection) the hazardous waste storage tanks and air emission controls on an annual basis.

The facility provided documentation of the volatile organic determination to PADEP Inspector Tripoli on January 12, 2004, and was found to be in order. However, Inspector Tripoli noted that the air emission control devices, e.g., pressure relief valves still had not been installed on the hazardous waste storage tanks. The facility representatives indicated that the tanks had been inspected in January 2003. However, no documentation of the inspection was kept by the facility. The facility representatives also informed Inspector Tripoli that one of the storage tanks had not been used for several years and thus was not subject to Subpart CC air emission standards. However, Inspector Tripoli noted that the facility failed to provide notification of closure of the tank to PADEP. See Attachment 3.

At the time of the December 2004 inspection, Inspectors Dodd and Tripoli noted that the aforementioned unused storage tank had been removed and a pressure relief closure had been installed on the vent pipe from the remaining hazardous waste storage tank. Facility representatives indicated that the pressure relief valve was installed on the tank vent pipe in June 2004. The facility provided documentation of a routine inspection of the solvent waste storage tank, dated August 25, 2004. See Attachment 8. Powerex also utilizes Level 1 containers to manage hazardous waste containing greater than 500 ppm volatile organics by weight. The Level 1 containers meet DOT standards and utilize covers with no visible gaps.

Attachments

1. EPA Generator Inspection Checklists
2. Location Map and Background Information
3. PADEP Inspection Report, January 12, 2004
4. Manifests
5. Training Documentation
6. 2004 Biennial Report
7. PADEP Subpart AA, BB, CC Checklist, January 2003
8. Solvent Waste Tank Inspection Form, August 25, 2004
9. Photos

EPA GENERATORS CHECKLIST

- Manifest
- Personnel Rec
- Emergency Response
- Inspection of 90 day Storage
- Biennial Hazardous Waste Report

Name of Facility:

Poverex

Address:

*200 E. Hill St.
Youngwood, PA 15697-1800*

Geo Coordinates

EPA ID#:

PAD005000513

Name/Title of

Facility Rep:

*Andy Varga - HR Director
Don Elder - Process Engineer*

*Signs Manifest
Overall responsibility Rec
keeping report generation
facility maintenance
handles on daily, direct of
Hazardous waste mgmt*

I. General:

1. Provide a brief description of the type of operation(s) that produce hazardous waste at this facility: *See notes.*

2. Does the facility perform the following on-site:

a. Storage (greater than 90 days) of hazardous waste: Yes ☒ No

b. Treatment of hazardous waste: Yes ☒ No

*WWTP permit by Rule.
Notification provided to EPA
12/03*

c. Disposal of hazardous waste: Yes ☒ No

If yes, complete appropriate TSD checklists.

List the maximum amount of each type of hazardous waste generated on a monthly basis and the amount accumulated on-site at the time of the inspection.

Waste Code

Amount Generated

Amount Accumulated

See biennial report

3. Is the facility subject to any exclusions for its hazardous waste: Yes ☒ No

If yes, list waste and basis for exclusion.

4. Waste Minimization: What has been done facility wide to reduce the volume and or toxicity of the waste generated? *See notes*

5. Does the facility generate any characteristic hazardous waste? Yes ☒ No

If yes, describe how these characteristics were determined, i.e.

testing or knowledge process/material used.

*Knowledge of process.
primarily*

6. Does the facility contemplate any changes in its operation from a hazardous waste generation or management perspective? Yes ☒ No

If yes, describe:

II. Manifest (Complete this section only if facility ships hazardous waste off-site)

262.20(a)

1. Does this facility use the Uniform Hazardous Waste Manifest? ☒ Yes No

If no, describe system used.

If yes, review a representative number of manifests and indicate whether they contain:

- a. Generator's name, mailing address, telephone number and EPA ID number? ☒ Yes No
- b. Transporter's name and EPA ID number? ☒ Yes No
- c. DOT waste description, including proper shipping name, hazardous waste class and DOT identification number? ☒ Yes No
- d. Number and type of containers (if applicable)? ☒ Yes No
- e. Quantity of each waste transported? ☒ Yes No
- f. Name, EPA ID number and site address of facility designated to receive the waste? ☒ Yes No
- g. The following certification? ☒ Yes No

"I hereby declare that the contents of this consignment are full and accurately described above by proper shipping name and are classified, packaged, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the

method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment."

262.23(a)

2. Did the generator:

- a. Sign and date the manifest? ☒ Yes ☐ No
- b. Obtain the handwritten signature and date of acceptance from the initial transporter? ☒ Yes ☐ No
- c. Ensure that return copies of the manifest from the TSD facility were properly signed and dated? ☒ Yes ☐ No
- d. Retain a copy of the signed manifest for at least three years? ☒ Yes ☐ No

(The inspector should obtain copies of any manifests that are found to have problems)

III. Pre-Transport Requirements

Manifest System: (Complete only if the facility ships hazardous waste off-site)

1. Identify the name and address of off-site facilities which have received waste from this generator.

Name:
Addr:
Phn:
ID#:

See Biennial report

2. Is there any indication that the facility is:

262.30

- a. Not packaging its waste in accordance with DOT regulations (49 CFR Parts 173, 178 and 179)? Yes ☒ No

262.31

- b. Not labeling each package in accordance with DOT regulations (49 CFR Part 172)? Yes ☒ No

262.32 (a) & (b)

- c. Not marking each container of 110 gallons or less with the words

"hazardous waste -----" or each package of hazardous waste in accordance with DOT regulations (49 CFR Part 172)? ☒ Yes ☐ No

If yes, explain: *See photos #8.*

Metric Acid Waste Solids - not labelled by waste.
Dated ✓

262.33

3. Does the facility placard or offer the transporter placards for its hazardous waste shipments? Yes ☐ No ☒

IV. Waste Accumulation

1. Does the facility utilize the following types of hazardous waste accumulation:

a. Satellite accumulation? ☒ Yes ☐ No

b. Less than 90 day storage? ☒ Yes ☐ No

Answer the following questions if the generator has satellite accumulation area(s).

262.34(c)(1)

2. Is satellite accumulation area(s) near the point of waste generation and under the control of the operator of the process actually generating the waste? ☒ Yes ☐ No

If no, describe:

262.34(c)(1)

3. Are there multiple satellite accumulation areas for any one process that generate hazardous waste? Yes ☐ No ☒

If yes, describe:

262.34(c)(1)

4. Is the waste stored in container(s)? ☒ Yes ☐ No

265.171

5. Are container(s) in good condition? ☒ Yes ☐ No

If no, explain:

262.34(c)(1)(ii)

6. Are container(s) marked with the words "hazardous waste" or with other words identifying the contents? ☒ Yes ☐ No

265.173(a)

7. Are container(s) kept closed? ☒ Yes ☐ No

265.171

8. Are any container(s) leaking? Yes ☒ No

If yes, describe:

262.34(c)(1)

9. Has the facility accumulated more than 55 gallons of hazardous waste or more than 1 quart of acutely hazardous waste in a satellite accumulation area? Yes ☒ No

If yes, answer the following questions.

a. Are the container(s) holding excess waste dated as to when accumulation began? Yes No *NA*

b. Does the excess waste comply with the less than 90 day storage requirements (40 CFR Part 262.34(a)) within three days of the time when accumulation of such excess waste began? Yes No *NA*

Answer the following questions if the facility has less than 90 day storage.

10. Does the facility maintain personnel training and other records required in 40 CFR Part 265.16? ☒ Yes ☐ No

If yes, do these records include:

265.16(d)(1) [as referenced by 262.34 (2)(4)]

a. Job title for each person related to hazardous waste management and the employee filling each job? ☒ Yes ☐ No

265.16(d)(2)

b. A written job description for each position? ☒ Yes ☐ No

265.16(d)(3)

c. A written description of the type and amount of training that will be given to each person? Yes ☒ No

265.16(d)(4)

d. Documentation that the training or job experience required by facility personnel to effectively respond to emergencies and other wise manage hazardous waste in a proper manner has been successfully completed? ☒ Yes ☐ No

265.16(b)

11. Have facility personnel successfully completed the required training or job

Facilities Engineer
Don Elder - Maint Supr
P1275
Maggie Adams
NOV 2004
Scheduled for Jan 2005
Process Melting Diffusion

Don Elder
Hazmat Tech
8/1
Hazmat Tech
9/1

Doesn't include Haz Waste Resp.

experience within six months after occupying the position. Yes No

265.16(c)

- *12. Do facility personnel take part in an annual review of initial training requirements and update them as necessary? Yes ☒ No

262.34(a)(4)

13. Does the facility maintain an adequate preparedness and prevention program as required in 40 CFR265 Subpart C? Yes ☒ No *Dated March 2003*

Is the facility equipped with:

265.32(a)

- a. Internal communications or alarm system? Yes ☒ No

*General Alarm - pull for
Plant PA System
- Temp
- Smith*

265.32(b)

- b. Telephone or hand-held two way radio? Yes ☒ No

*Telephones
Hand held radios*

265.3(c)

- c. Portable fire extinguishers or other fire control equipment, spill control equipment and decontamination equipment? Yes ☒ No

Sprinkle system

265.32(d)

- d. Adequate volume of water? Yes ☒ No

Fire line - municipal water system.

265.33

14. Does the facility maintain the above equipment to assure its proper operation?

Yes ☒ No

*Spill kits, fire ext., annual fire sp.
outside contractor system inspection*

Single tank

265.35

15. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment to areas where hazardous waste are located in the event of emergency?

Yes ☒ No

265.37(a)(1)

16. Has the facility made arrangements with local authorities to familiarize them with the layout of the facility and the nature/hazards of the hazardous waste handled at the facility? Yes ☒ No

*Emergency Response guide provided to fire dept
and local emergency response agency*

262.34(a)(4)

Facility have had local emergency responders on site

17. Has the facility prepared a contingency plan and is it maintained at the facility?

Yes ☒ No

If yes, does it contain the following:

- a. Description of the actions that are to be taken in case of an emergency (all potential types of emergencies should be identified)? ☒ Yes ☐ No
- b. Description of arrangements made with local authorities? ☒ Yes ☐ No
- c. Current list of emergency coordinators names, addresses and phone numbers (office and home)? ☒ Yes ☐ No
- d. List of all emergency equipment at the facility, including locations, descriptions and relevant capabilities? ☒ Yes ☐ No
- e. Evacuation plan for facility personnel? ☒ Yes ☐ No

The inspector should obtain a copy of the facility's contingency plan if problems are found.

265.53(b)

18. Were copies of contingency plan presented to local authorities that may provide emergency services? ☒ Yes ☐ No

19. Has the facilities contingency ever failed in an emergency? Yes ☒ No ☐ N/A

If yes:

265.54(b)

a. Was the contingency plan immediately amended?

265.56(j)

20. If the contingency plan is implemented, does the facility record the incident in its operating log and submit a written report of the incident to the appropriate state agency? Yes ☐ No ☐ N/A

Guard writes incident report during emergency. Log is kept.

262.34(a)(1):

21. What is the method of waste storage:

Containers? ☒ Yes ☐ No

Tanks? ☒ Yes ☐ No

Other? ☐ Yes ☐ No If yes, describe:

262.34(a)(2)&(3)

22. Are the container(s) marked with the words "Hazardous Waste" and the date that was accumulation in that container begins? ☒ Yes ☐ No

*See photo #8.
Nitric Acid Waste Solids
3 drums*

262.34(a)

23. Based upon accumulation dates, have any container(s) been in storage more than 90 days? Yes ☒ No

If yes, inspector should complete the appropriate TSD checklists.

265.171

24. Are container(s) in good condition? ☒ Yes No

If no, explain:

265.172

25. Are containers made out of or lined with materials which will not react with or be incompatible with the wastes they are storing? ☒ Yes No

265.173(a)

26. Are containers kept closed? ☒ Yes No

265.171

27. Are any container(s) leaking? Yes ☒ No

If yes, describe:

265.174

* 28. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained? Yes ☒ No

If no, explain:

*Waste disposal control
Inspected bi-weekly by Castle Environn
p*

265.35

29. Is adequate aisle space maintained? ☒ Yes No

If no, explain:

265.176

30. Are container(s) holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? Yes No ☒ N/A

31. Are incompatible wastes placed in the same container(s)? Yes ☒ No

If yes, explain:

265.177(a)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxic emissions occurred. Yes ☒ No

If yes, describe:

265.177(c)

32. Are container(s) holding incompatible hazardous wastes properly separated or protected from one another while in storage. Yes No N/A

Answer the following questions if the facility uses tank storage.

262.34(a)(3)

33. Is the tank(s) labeled or clearly marked with the words "Hazardous Waste"? Yes No Yes

to Mixed Solvent Tank

262.34(a)

34. Is the tank(s) marked with the date that waste accumulation begins in the tank(s) or does the facility have in its records when waste accumulation started in the tank(s)?

Yes No

Removed every 3 months or sooner.
Levels checked by - weekly

262.34(a)

35. Based upon accumulation dates, has the facility stored hazardous waste in its tank(s) for more than 90 days? Yes No

If yes, the inspector should complete the appropriate TSD checklists.

36. Which of the following describes the tank(s) employed at this facility (highlight or circle appropriate response(s))?

☒ Indoor - not on impermeable floor

☒ Indoor - on impermeable floor

☒ Outdoor - above ground located in a vault

☒ Outdoor - in ground

☒ Outdoor - underground

37. What is the approximately age of the tank(s)? Approx 10 years

265.191

38. Does the tank(s) appear to be in good condition? Yes No

If no, describe:

265.191

39. Is the tank(s) leaking? Yes ☒ No

If yes, describe:

265.193

40. Is the tank(s) provided with an effective secondary containment system? Yes ☒ No

Contained in a vault.

265.191(b)

41. Was a leak test performed on the tank(s)? Yes ☒ No

265.194(b)

42. Is the tank(s) provided with adequate controls to prevent spills or overflows (i.e., automatic feed cutoff, bypass to another unit, high level alarms, etc.) Yes ☒ No

Bi weekly level checks

265.194(b)

43. Is there sufficient freeboard (2 feet) in uncovered tank(s) to prevent overtopping by wave or wind action or precipitation? Yes ☒ No ☒ N/A

265.195(a)

44. Is tank(s) inspected each operating day? Yes ☒ No

*See notes
Solvent Waste Tank For*

If yes, do inspections include:

265.195(a)(1)

a. Overfill/spill control equipment? Yes ☒ No ☒ N/A

*Castle Environmental
personnel checks tank
biweekly.*

265.195(a)(2)

b. Above ground portions of the tank(s) for corrosion or releases? Yes ☒ No

*Went for all
inspections*

265.195(a)(3)

c. Data gathered from monitoring equipment and leak detection equipment?
Yes ☒ No ☒ NA

265.195(a)(4)

d. Area immediately surrounding the externally accessible portion of the tank(s) and secondary containment system for signs of erosion and releases? Yes ☒ No

265.195(b)(4)

45. Does this facility perform annual inspections of the cathodic protection system, if present. Yes ☒ No ☒ N/A

265.195(c)

46. Does the facility properly document all of the results of its tank system inspections?
Yes ☒ No

*Security guard
or maintenance
personnel check the
tank for a daily
visual release. Not
documented.*

265.196

47. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank(s) from service immediately, failure to provide notification, etc.)? Yes No

If yes, describe:

48. Does the facility store any ignitable or reactive waste in its tank(s). ~~Yes~~ ~~No~~ Yes

If yes:

265.198(a)(1)

- a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste? Yes No

265.198(a)(2)

- b. Is the waste stored in such a way that it is protected from any material or condition that may cause the waste to ignite or react? Yes No

265.198(a)(3)

- c. Is the tank(s) used solely for emergencies? Yes No

265.198(b)

- d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares? Yes No

If no, describe:

49. Is there any indication that incompatible wastes are being stored in a tank(s)? Yes No

V. Record Keeping and Reports

262.42(a)(2)

1. Does the facility prepare an Exception Report and submit it to the Regional Administrator if a signed copy of the manifest is not received within 45 days of the date the waste was accepted by the initial transporter? Yes No NA

If yes:

- a. Legible copy of the manifest? Yes No NA

- b. Cover letter explaining generators efforts to locate waste and the results of those efforts? Yes No **NA**

262.41(a)

2. If the facility ships any hazardous waste off-site, does it prepare a Biennial Report and submit it to the Regional Administrator by march 1 of each even numbered year.

Yes No N/A

If yes, does the Biennial Report include:

262.41(a)(3)

- a. Name, address and EPA ID number for each off-site TSD facility to which waste was shipped during the year? **Yes** No

262.41(a)(4)

- b. Name and EPA ID number of each transporter used during the year? **Yes** No

262.41(a)(5)

- c. Description and quantity of each hazardous waste shipped off-site (listed by EPA ID number of each TSD facility to which it was shipped)? **Yes** No

262.41(a)(6)

- d. Efforts undertaken during the year to reduce the volume and toxicity of the waste generated? Yes **No** *Form 25 R*

262.41(a)(7)

- e. Description of the changes in volume and toxicity of the waste actually achieved during the year? Yes **No**

262.40(a)(b)(c)

3. Does the facility retain copies of Biennial Reports, Exception reports and test results/waste analyses for a minimum of three years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal? **Yes** No

Additional Comments:

Inspector's Name: J. DODD
Title: Inspector
Agency: EDO
Office Location: WFO
Date of Inspection: 12/14/04

INSPECTION CHECKLIST
AIR EMISSIONS STANDARDS
FOR
TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS
(Part 264/265 Subpart CC)

Note: Does not apply to satellite accumulation areas, containers less than 26 gal or small quantity generators.

Name of Facility -- *Powerex*

Location of Facility -- *Youngwood, PA 15697-1800*

Date of Inspection -- *12/14/04*

Name of Inspector -- DOES THIS FACILITY GENERATE A WASTE STREAM WITH AN AVERAGE VO CONCENTRATION, AT THE POINT OF ORIGIN, OF 500 PARTS PER MILLION BY WEIGHT (500 ppmw) ? *YES*

A. General IF YES

1. ~~DOES~~ the facility claims that the Subpart CC regulations are not applicable to their waste management unit(s) or that the unit(s) are exempt from regulation, explain the reason for the claim.

No

B. Waste Determination

265.1084(a) (1)

1. Does the facility determine the VOC content of its hazardous waste at the point of waste origination? yes no

265.1084(a) (2)

If yes, does the facility determine the VOC content of its hazardous waste by (a) direct measurement or (b) using knowledge of the waste (circle one)? *(b) used knowledge of ms and volatile organics*

265.1084(a) (4) (i)

If (b), has the facility prepared and maintained records showing the information used as the basis for the O/O's knowledge of the hazardous waste stream's average VOC concentration? *(yes)* no

265.1084(a)(3)(ii)(B)

2. Were at least four representative samples collected within a year to determine VOC content? yes no N/A

3. Does the facility perform any other waste determinations as required by the Subpart CC regulations? yes no

If yes, describe:

C. Tanks (40 CFR §265.1085)

skip this section if the facility does not use tanks for waste management

1. Which of the following emissions control devices does the facility employ for its tanks that manage hazardous waste with an average VOC concentration \geq 500 ppmw (circle appropriate ones)

- a. fixed roof (Level 1 control (265.1085(c)))
- b. fixed roof equipped with an internal floating roof (Level 2 control (265.1085(d)))
- c. external floating roof (Level 2 control)
- d. tank vented through a closed vent system to a control device (Level 2 control)
- e. pressure tank (Level 2 control)
- f. tank located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device (Level 2 control)
- g. other
- h. none

If (g) other, describe:

Tank is vented through a pipe which contains
an pressure valve release valve. Installed in
June 2004.

2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)? yes no N/A

If no, describe:

265.1084(c) (1)

3. If a fixed-roof tank (Level 1 control) is used for storage of a hazardous waste with >500 ppmw VOC, is the maximum vapor pressure of the waste determined and the results maintained in the facility's records? Yes No N/A

265.1085(b) (2)

4. Are tank(s) used for waste stabilization utilizing a Level 2 control? Yes No N/A

D. Surface Impoundments (40 CFR §265.1086) **NA**

skip this section if the facility does not use surface impoundments for waste management

1. Which of the following emissions control devices does the facility employ for its surface impoundments that manage hazardous waste with an average VOC concentration \geq 500 ppmw (circle appropriate ones)

- a. floating membrane cover
- b. cover that is vented through a closed-vent system to a control device
- c. other
- d. none

If (c) other, describe:

2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)? yes no N/A

If no, describe:

E. Containers (40 CFR §265.1087)

skip this section if the facility does not use containers for waste management

1. Which of the following emissions control devices does the facility employ for its containers that manage hazardous waste (circle appropriate ones)
- ☒ a. container meets DOT regulations - i.e., the container is closed and there are no visible holes, gaps, cracks or other openings in the container (Level 1 (265.1087(c)) or Level 2 (265.1087(d)) standard)
 - b. cover and closure devices that form a continuous barrier over the container openings (Level 1 standard)
 - c. organic-vapor suppressing barrier placed on or over the hazardous waste (Level 1 standard)
 - d. container that operates with no detectable organic emissions as defined in §265.1081 (Level 2 standard)
 - e. container demonstrated within the past 12 months to be vapor-tight (Level 2 standard)
 - f. container that is vented directly through a closed-vent system to a control device (Level 3 (265.1087(e)) standard)
 - g. container that is vented inside an enclosure which is exhausted through a closed-vent system to a control device (Level 3 standard)
 - h. other
 - i. none

If (h) other, describe:

2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)? ☒ yes no N/A

If no, describe:

265.1087(b)(1)(i) & (ii)

3. Are containers between 26 & 122 gallons not used for a waste stabilization process and containers greater than 122 gallons not in light material service provided with Level 1 control? ☒ Yes No N/A

In light material service means the container is used to manage a material for which both of the following conditions apply: the vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20 °C and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20 °C is equal to or greater than 20 percent by weight.

265.1087(b)(1)(iii)

4. Are containers greater than 122 gallons in light material service provided with Level 2 control? Yes No ☒ N/A

265.1087(b)(2)

5. Are containers greater than 26 gallons used for a waste stabilization process provided with a Level 3 control? Yes No ☒ N/A

F. Inspections & Monitoring

complete this section if the facility is using air emission controls

265.1089(b)

1. Has the facility developed and implemented a written plan and schedule to perform all required inspection and monitoring activities of its air emissions control equipment? yes no

265.1085(k) (1) & 265.1086(f) (1)

2. In the event of a defect involving a tank or surface impoundment, did the facility make first repairs no later than 5 calendar days after detection and complete repairs no later than 45 calendar days after detection?

yes no N/A

265.1087(c) (4) (iii), 265.1087(d) (4) (iii)

3. In the event of a defect involving a container using Container Level 1 or Level 2 controls, did the facility make first repairs no later than 24 hours after detection and complete repairs no later than 5 calendar days after detection?

yes no N/A

G. Recordkeeping

265.1084(a) (3) (ii) (C)

1. Does the facility have a written sampling and analysis plan which describes the procedures by which representative samples will be collected and handled and is a copy maintained on-site? yes no *NA*

265.1090(b) (1) (ii) & (c) (3)

2. Does the facility maintain copies of inspection records, including dates of inspections and a description of defects and corrective actions taken to repair defects or problems involving its air emissions control equipment, for its tanks and surface impoundments? Yes *No* N/A

265.1087(c) (5)

3. Does the facility maintain a copy of the procedure used to determine that containers ≥ 122 gal which do not meet applicable DOT regulations are not managing hazardous waste in light material service? Yes No *N/A*

265.1090(a)

4. Are the above records maintained in the operating record for a minimum of three years? yes no N/A

Comments:
